

EXHIBIT 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE)
ANTITRUST LITIGATION)
) No. 11-CV-2509-LHK
THIS DOCUMENT RELATES TO:)
ALL ACTIONS.)
_____)

ATTORNEYS' EYES ONLY - HIGHLY CONFIDENTIAL

VIDEO DEPOSITION OF ARNON GESHURI

AUGUST 17, 2012

Reported by: Rosalie A. Kramm, CSR No. 5469, CRR

10:15:35 1 fill that job through the various methods that you come
10:15:37 2 up with, it's up to that recruiter to get it done.

10:15:42 3 Q. And those methods included sourcing, correct?

10:15:46 4 A. Those methods included sourcing.

10:15:50 5 Q. Do you have any idea in terms of breakdown by
10:15:54 6 time what proportion of time that the recruiting
10:15:59 7 organization spent on the sourcing part of it in terms of
10:16:03 8 relying on that sourcing method.

10:16:05 9 MR. RUBIN: You're saying in terms of person
10:16:07 10 hours?

10:16:08 11 MR. HARVEY: Yes.

10:16:12 12 THE WITNESS: I -- I -- I -- so I'm not quite
10:16:14 13 sure how it's broken down. I would -- I would -- the
10:16:18 14 recruiters -- one of the things that I mentioned before
10:16:21 15 is that we had over 2 million applications that came in,
10:16:26 16 and a recruiter's pipeline was pretty full. So their
10:16:33 17 responsibility was to get through that pipeline the
10:16:35 18 majority of the time, and -- and whether that came from
10:16:37 19 the employee referral program or through the extranet
10:16:42 20 website -- so I don't know the exact breakdown.

10:16:46 21 BY MR. HARVEY:

10:16:47 22 Q. But the primary responsibility of a recruiter
10:16:50 23 is to find good people, correct?

10:16:52 24 A. The primary responsibility is to find good
10:16:54 25 people that will fit the roles within the company, the

10:16:58 1 company's needs at the time.

10:16:59 2 Q. And so -- okay. That's fine.

10:17:16 3 And the recruiting organization, I believe you
10:17:19 4 said that when you were hired, there were [REDACTED] people in
10:17:22 5 this organization, and when you left, there were
10:17:24 6 approximately [REDACTED], correct?

10:17:27 7 A. Not exactly. So during the heyday, or as we
10:17:32 8 ramped up, we -- we hit around [REDACTED] staffing
10:17:37 9 professionals in the company. But when I left, it was a
10:17:41 10 different number, which I don't -- I don't know, because
10:17:43 11 I was out of that role when I left the company.

10:17:46 12 So -- so basically -- but during its most
10:17:49 13 prolific time, it was around [REDACTED] people.

10:17:53 14 Q. And what years fell into this prolific period?

10:17:57 15 A. It was probably the -- well, it wasn't
10:17:59 16 immediate, because I had to build up to that. So it was
10:18:02 17 probably -- maybe my second or third year there, those
10:18:06 18 are the two -- the two years.

10:18:08 19 Q. So 2005, 2006?

10:18:10 20 A. This was -- yeah, and I think that was parallel
10:18:14 21 to the growth of the company. We can look at the
10:18:16 22 headcount numbers of the company, but you can see how it
10:18:19 23 was a pretty big spike in growth.

10:18:21 24 Q. Sure. And let's see.

10:18:24 25 When you became the director of HR, I take it

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10:18:29 1 in approximately the beginning of 2009, roughly how many
10:18:32 2 people worked in the recruiting organization?

10:18:36 3 A. I -- I don't -- I actually don't recall.

10:18:39 4 Q. Was it more than [REDACTED]?

10:18:41 5 A. Yeah, I -- I don't -- I don't recall. It was
10:18:43 6 in [REDACTED], but I don't -- I don't recall the exact
10:18:46 7 number when I left.

10:18:52 8 Q. Did you rely exclusively on Google employees as
10:18:55 9 part of this recruiting function, or did you also
10:18:57 10 occasionally rely on third-party recruiters?

10:19:01 11 MR. RUBIN: Objection. Vague as to "third
10:19:03 12 parties."

10:19:04 13 THE WITNESS: Describe third-party recruiters
10:19:06 14 to me, if you don't mind.

10:19:08 15 BY MR. HARVEY:

10:19:08 16 Q. Anyone who would recruit on Google's behalf who
10:19:12 17 was not on Google's direct payroll.

10:19:14 18 MR. RUBIN: Same objection.

10:19:16 19 THE WITNESS: So we -- so -- from my -- from
10:19:22 20 how we structure the organization, just really briefly,
10:19:27 21 is that for very senior level hires, we on occasion would
10:19:32 22 use a search firm that would help us to find very senior
10:19:36 23 people.

10:19:38 24 BY MR. HARVEY:

10:19:40 25 Q. Would you use -- well, were there any other

10:22:57 1 and utilize, and that was -- that was how they structured
10:23:03 2 their organization.

10:23:05 3 Q. And how many individuals worked in the sourcing
10:23:08 4 team when you were first hired at Google?

10:23:11 5 A. There were -- if I recall correctly, there were
10:23:14 6 [REDACTED] at the time. It was just [REDACTED] recruiters when I first
10:23:18 7 started. [REDACTED]

10:23:20 8 Q. And then how did you grow the sourcing team
10:23:23 9 during your time at Google?

10:23:25 10 MR. RUBIN: Objection. Vague.

10:23:27 11 THE WITNESS: So my responsibility was to build
10:23:32 12 the infrastructure for a successful group. I focused on
10:23:36 13 building recruiters and making sure we had enough volume
10:23:40 14 recruiters to handle the influx of applicants.

10:23:44 15 And then as a need came up where we needed to
10:23:47 16 find diamonds in the rough, great candidates, I created a
10:23:53 17 team of folks doing research in finding excellent talent.
10:23:58 18 BY MR. HARVEY:

10:23:58 19 Q. And what was the first hire for the sourcing
10:24:00 20 team -- I'm sorry. When was the first hire?

10:24:03 21 A. I -- I don't -- I don't recall. Honestly,
10:24:06 22 again, I don't remember exactly when I first hired a
10:24:08 23 sourcer. Yeah. I don't -- I don't recall. I can't
10:24:12 24 answer. I don't know exactly when. It was a -- it
10:24:15 25 was -- I don't know when.

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10:24:18 1 Q. Do you remember whether it was in 2004 or 2005?

10:24:23 2 MR. RUBIN: Objection. Calls for speculation.

10:24:24 3 THE WITNESS: Yeah, I still don't remember
10:24:25 4 exactly when we hired the first sourcer. It's just not
10:24:28 5 specific to me. I can't remember.

10:24:30 6 BY MR. HARVEY:

10:24:30 7 Q. How many people worked in sourcing when it was
10:24:33 8 at its largest size?

10:24:36 9 A. I -- I probably had -- of order of magnitude,
10:24:44 10 probably [REDACTED] people doing sourcing, out of a team of

10:24:48 11 [REDACTED]

10:24:49 12 Q. Oh, so you're including that within the [REDACTED]?

10:24:53 13 A. Yeah.

10:24:53 14 Q. In terms of --

10:24:53 15 A. I said that -- before I mentioned [REDACTED] staffing
10:24:55 16 overall.

10:24:56 17 Q. I see. Thank you.

10:25:09 18 And then moving on to your final role at
10:25:11 19 Google, when you were director of HR, could you -- could
10:25:18 20 you kind of describe categories of responsibilities you
10:25:22 21 had in that role.

10:25:24 22 A. Yeah. I -- I was basically responsible for --
10:25:29 23 for a specific area within -- within the engineering
10:25:32 24 organization to support the employee base. So that means
10:25:35 25 that I handled employee relations issues. I helped to

10:25:44 1 deal with, you know, personal -- or like ergonomic
10:25:50 2 issues, when people had problems with their work space,
10:25:53 3 or if they had medical problems how they got on
10:25:55 4 disability and things like that. So I basically just
10:25:57 5 handled a variety of employee issues to help -- to help
10:26:01 6 those groups function within the work environment.

10:26:12 7 Q And did you have any other responsibilities
10:26:14 8 while you were in HR, aside from the ones that you
10:26:18 9 described?

10:26:18 10 A. There was a variety -- whatever it was -- there
10:26:19 11 was a variety of roles, but it all focused on -- Dean, it
10:26:23 12 all focused on the -- the interaction of employees, you
10:26:28 13 know, if managers had a low performer, helping them walk
10:26:31 14 through that, how to -- how to help that employee get
10:26:35 15 better or whatever else we need to do. So that -- so
10:26:38 16 basically I was -- I was responsible for helping managers
10:26:41 17 and employees just deal with the work environment. But
10:26:44 18 the issues were pretty varied, and I just helped to --
10:26:47 19 helped them to make it through the -- make it through and
10:26:50 20 be a better -- better person as an outcome.

10:27:37 21 MR. HARVEY: I believe this is Exhibit 170. If
10:27:38 22 you could please mark this and hand it to the witness.

10:27:41 23 (Exhibit 170 was marked for identification.)

10:27:41 24 BY MR. HARVEY:

10:27:42 25 Q. This document is a PDF of the current bios of

1 I, Rosalie A. Kramm, Certified Shorthand
2 Reporter licensed in the State of California, License No.
3 5469, hereby certify that the deponent was by me first
4 duly sworn and the foregoing testimony was reported by me
5 and was thereafter transcribed with computer-aided
6 transcription; that the foregoing is a full, complete,
7 and true record of said proceedings.

8 I further certify that I am not of counsel or
9 attorney for either of any of the parties in the
10 foregoing proceeding and caption named or in any way
11 interested in the outcome of the cause in said caption.

12 The dismantling, unsealing, or unbinding of the
13 original transcript will render the reporter's
14 certificates null and void.

15 In witness whereof, I have hereunto set my hand
16 this day: August 24, 2012.

17 X Reading and Signing was requested.

18 Reading and Signing was waived.

19 Reading and signing was not requested.

20

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